

AFFIDAVIT

I, Herman L. Arnold, having been duly sworn, hereby depose and state as follows:

1. I am a Special Agent of the United States Department of State, Diplomatic Security Service ("DSS"), and have been so employed since August, 2002. As part of my official duties, I am assigned to investigate violations of matters relating to the U.S. Department of State, including passport and visa fraud, illegal, improper use and possession of identification documents and false statements made to illegally obtain passports and visas.

2. The information set forth in this affidavit is based upon my investigation as well as information provided by the Boston Passport Agency, and other public agencies. In submitting this affidavit, however, I have not included each and every fact known to me about the investigation, but only those facts that I believe are sufficient to establish probable cause to believe that an individual named Lance Steven Tirso ROXAS conspired with another to willfully and knowingly make a false statement in an application for a passport with the intent to induce or secure the issuance of a U.S. passport, in violation of Title 18, United States Code, Section 371 and Title 18, United States Code, Section 1542.

3. On March 4, 2002, a person using the identity of Lance Steven Tirso ROXAS submitted an application ("DS-11") for a

United States passport at the U.S. Post Office located in Cambridge, MA. A copy of the passport application is appended hereto as Exhibit A. In support of the application, the person submitted a birth certificate in the name of Lance Steven Tirso Roxas from the Board of Health and Vital Statistics of Hudson County, Jersey City, New Jersey, reflecting that the person was born on May 9, 1971, in Jersey City, New Jersey. A copy of the birth certificate is appended hereto as Exhibit B. The person signed the application in the presence of an authorized passport acceptance clerk, attesting that all of the information contained therein was true. Also, as required, the applicant submitted two photographs of himself and one was attached to the passport application at the time of its submission.

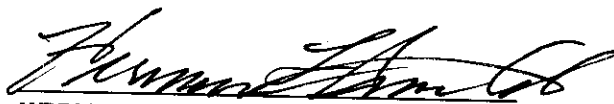
4. On January 14, 2004, Diplomatic Security Service Special Agent William T. Noone of the New York Field Office of the Diplomatic Security Service interviewed the person who submitted the application. He admitted that his true name is Renald Jean-Baptiste, and that he falsely claimed to be Lance Steven Tirso Roxas in submitting the March 4, 2002 passport application. Jean-Baptiste stated that he acquired the identity documents for the passport application from the true Lance Steven Tirso Roxas. A copy of Jean-Baptiste's sworn statement is appended hereto as Exhibit C.

5. On January 14, 2004, the true Lance Steven Tirso ROXAS

was interviewed by Diplomatic Security Service Special Agent William T. Noone of the New York Field Office of the Diplomatic Security Service. ROXAS admitted that he supplied Renald Jean-Baptiste with identification documents for the purpose of aiding him in obtaining employment and a U.S. Passport, knowing that Jean-Baptiste was not entitled to a U.S. Passport. A copy of Lance Steven Tirso Roxas's sworn statement is appended hereto as Exhibit D.

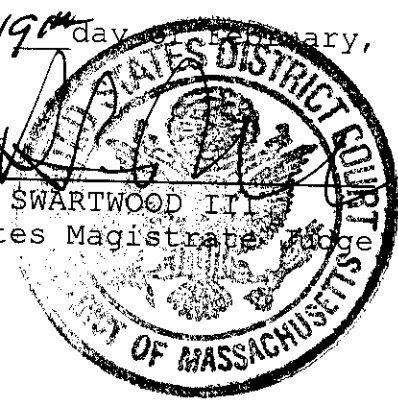

6. Based on the foregoing, I have probable cause to believe that Lance Steven Tirso ROXAS, did conspire to willfully and knowingly make a false statement in an application for a passport with the intent to induce or secure the issuance of a U.S. passport, for the use of another, in violation of Title 18, United States Code, Sections 371 and 1542.

I certify that the foregoing is true and correct. Executed at Boston, Massachusetts, this 19th day of February, 2004.



HERMAN L. ARNOLD
Special Agent
U.S. Department of State,
Diplomatic Security Service

Subscribed and sworn before me this 19th day of February, 2004, in Boston, Massachusetts.



CHARLES B. SWARTWOOD III
United States Magistrate Judge

EXHIBIT A

APPLICATION FOR ☐ U.S. PASSPORT ☐ REGISTRATION

(Type or print all capital letters in blue or black ink in white areas only)

INA Tar. Pietro Perini via. Milano 25



It is necessary to submit a statement with an application for a new passport when a previous valid or potentially valid passport cannot be presented. The statement must set forth in detail why the previous passport cannot be presented. Use Form DS-64.

10. Date: March 26, 1968 125 W-200 APPLICATION APPROVAL

SOLD

EXHIBIT B

BIRTH REGISTRATION CERTIFICATE

Board of Health and Vital Statistics
OF HUDSON COUNTY
JERSEY CITY, NEW JERSEY



NAME

S

PLACE OF BIRTH

DATE OF BIRTH

JERSEY CITY, N. J.

This is a true certification of name and birth facts as recorded in this office.

MAY 13th, 1971

REGISTRATION DATE

MAY 14th, 1971

DATE ISSUED

Maurice Summer

MURICE SUMMER
 REGISTRAR OF VITAL STATISTICS

STATE OF NEW JERSEY

EXHIBIT C

United States Department of State
Bureau of Diplomatic Security



SWORN STATEMENT

PLACE: SKYLIGHT DINER
34TH STREET & 9TH AVE MANHATTAN, NY

DATE: 11/14/2004

I Ronald Jean Baptiste, hereby make the following statement voluntarily to SA WILLIAM NOONE who has been identified to me as a Special Agent of the Diplomatic Security Service, United States Department of State.

Ronald Jean Baptiste Lance Rorer

I ~~thought~~ thought I could have get away of using Lance's IDs so that I could get out of the country to be able to do a job downing.

No I did not pay for the documents. Lance let me use them because he was a good friend to me.

No I do not have the documents I sent them by fall of 2002 to the passport agency. I don't know where they are right now because I don't have them. I got all the documents from Lance. I applied in Boston.

It was the only time I have ever done such a thing. I was just trying to do a job. I never had any problem with the law, never been arrested.

Ronald Jean Baptiste
414 W 036 St DC NY NY 10018
212-594 87142
B-9-73 Birth date
I came to the U.S.A in May 89
032-76-2858

X Ronald Jean Baptiste

United States Department of State
Bureau of Diplomatic Security

I SWEAR THAT THE CONTENTS OF THIS STATEMENT OF RENALD JEAN BAPTISTE
PAGES ARE TRUE AND CORRECT: THAT I HAVE MADE THIS STATEMENT OF MY OWN FREE WILL
AND ACCORD WITH NO PROMISES OF IMMUNITY HAVING BEEN MADE TO ME AND WITHOUT ANY
THREATS, FORCE, OR COERCION BEING USED AGAINST ME. I MAKE THIS STATEMENT IN AN
EFFORT TO ASSIST THE UNITED STATES DEPARTMENT OF STATE IN AN OFFICIAL
INVESTIGATION. I HAVE BEEN COURTEOUSLY TREATED AND I HAVE NO OBJECTION TO THE
CONDUCT OF THE INTERVIEWING OFFICERS.

FURTHER DEPONENT SAITH NOT.

S: Renald Jean Baptiste

SUBSCRIBED AND SWORN BEFORE ME ON THIS 14 DAY OF JAN, 2004

S: William T. Lane
SPECIAL AGENT
U.S. DEPARTMENT OF STATE
DIPLOMATIC SECURITY SERVICE
1 Executive Drive, 5th Floor
Fort Lee, NJ 07024

WITNESS: S: William T. Lane SA-7 HORASKE [unclear]
Special Agent
U.S. DEPARTMENT OF STATE
DIPLOMATIC SECURITY SERVICE
1 Executive Drive, 5th Floor
Fort Lee, NJ 07024

EXHIBIT D

United States Department of State
Bureau of Diplomatic Security



SWORN STATEMENT

PLACE: CRUNCH FITNESS 32nd ST 3rd W 7th / BWAY

DATE: 14 JAN 2004

I LANCE DOXAS, hereby make the following statement voluntarily to SA William Noone who has been identified to me as a Special Agent of the Diplomatic Security Service, United States Department of State.

THAT DURING THE YEAR OF 2002 I LENT MY DOCUMENTATION TO SEAN SAPISTIC OF 444 34TH ST. NY NY. I FELT VERY BAD FOR MR. SAPISTIC AS HE WAS LEFT ALONE BY HIS FAMILY AFTER BEING PROSECUTED IN THIS COUNTRY ILLEGALLY. HE (GOT OFFERED) THE JOB OF HIS DREAMS WITH THE CLOUDS DID SHOW. I GAVE HIM MY DOCUMENTATION SO HE COULD ATTAIN DOCUMENTATION WITH HIS VISA IN IT THAT WOULD ENABLE HIM TO TAKE THE JOB HE THEN FOUND OUT THAT HE NEEDED TO FLY CUBANAS FOR THE REST OF HIS AND TO GET AGAIN LENT HIM DOCUMENTATION SO HE COULD ATTAIN A PASSPORT. I FELT VERY SORRY FOR MR. SAPISTIC DUE TO THE COMPLICATIONS HE HAS HAD TO FACE IN HIS AND THAT TO WHAT LED ME TO LEND HIM MY DOCUMENTATION.

United States Department of State
Bureau of Diplomatic Security

I SWEAR THAT THE CONTENTS OF THIS STATEMENT OF LANGLER REAMS ()
PAGES ARE TRUE AND CORRECT: THAT I HAVE MADE THIS STATEMENT OF MY OWN FREE WILL
AND ACCORD WITH NO PROMISES OF IMMUNITY HAVING BEEN MADE TO ME AND WITHOUT ANY
THREATS, FORCE, OR COERCION BEING USED AGAINST ME. I MAKE THIS STATEMENT IN AN
EFFORT TO ASSIST THE UNITED STATES DEPARTMENT OF STATE IN AN OFFICIAL
INVESTIGATION. I HAVE BEEN COURTEOUSLY TREATED AND I HAVE NO OBJECTION TO THE
CONDUCT OF THE INTERVIEWING OFFICERS.

FURTHER DEPONENT SAITH NOT.

S: [Signature]

SUBSCRIBED AND SWORN BEFORE ME ON THIS 14 DAY OF JAN, 2004

S: [Signature]
SPECIAL AGENT
U.S. DEPARTMENT OF STATE
DIPLOMATIC SECURITY SERVICE
1 Executive Drive, 5th Floor
Fort Lee, NJ 07024

WITNESS: S: [Signature]
Special Agent
U.S. DEPARTMENT OF STATE
DIPLOMATIC SECURITY SERVICE
1 Executive Drive, 5th Floor
Fort Lee, NJ 07024